

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re:) Chapter 11
)
FORD CITY CONDOMINIUM ASSOCIATION,) No. 21-B-05193
)
Debtor.) Judge Deborah L. Thorne

**JOINT MOTION FOR ORDER REGARDING MOTION FOR ALLOWANCE AND
PAYMENT OF ADMINISTRATIVE CLAIM [DOCKET NO. 286]**

William B. Avellone, as Subchapter V Trustee in possession of the Ford City Condominium (the “**Subchapter V Trustee**”), on the one hand, and Ford City Realty LLC, Ford City CH LLC, and Ford City Nassim LLC (collectively, “**Ford City Realty**”), on the other hand, by and through their respective undersigned counsel, file this *Agreed Motion and Proposed Order Regarding Motion for Allowance and Payment of Administrative Claim [Docket No. 286]* (this “**Motion**”), and respectfully state as follows:

1. On July 29, 2021, Ford City Realty filed proof of claim number 4-1 (the “**Proof of Claim**”) in the amount of \$1,399,635.48 for “Amounts owed for water supplied to Debtor” and certain related charges and expenses.
2. On February 27, 2024, Ford City Realty filed its *Motion for Allowance and Payment of Administrative Claim [Docket No. 286]* (the “**Administrative Claim Motion**”), seeking entry of an order providing for the allowance of an administrative claim for Ford City Realty on account of water provided after the Petition Date (the claim for prepetition and postpetition amounts owed, the “**Claim**”). A hearing on the Administrative Claim Motion is currently scheduled to be heard on October 22, 2025.

3. On July 23, 2025, the Subchapter V Trustee filed that certain *Objection to Claim 4-1 of Ford City Realty LLC, Ford City CH LLC and Ford City Nassim LLC and to the Motion for Allowance and Payment of Administrative Claim [Doc 286]* [Docket No. 392] (the “Claim Objection”), arguing, among other things, that the Subchapter V Trustee has yet to receive documentation substantiating the Claim.

4. On September 29, 2025, counsel to Ford City Realty provided counsel to the Subchapter V Trustee copies of invoices (the “**Invoices**”) from the City of Chicago to the Ford City Mall and from the Ford City Mall to the Ford City Condominium from 2019 through early 2025. The Subchapter V Trustee’s review of the Invoices remains ongoing.

5. The Court ordered Ford City Realty to respond by October 1, 2025. By agreement of the parties, the deadline for Ford City Realty to respond to the Claim Objection was extended to October 9, 2025. To allow the Subchapter V Trustee time to review the Invoices, the parties have agreed to a further extension of the deadline to respond to October 21, 2025, and file this Motion for entry of the Proposed Order attached hereto as **Exhibit A**.

WHEREFORE, the Subchapter V Trustee, Ford City Realty LLC, Ford City CH LLC, and Ford City Nassim LLC respectfully request that the Court enter the Proposed Order and grant such other and further relief as the Court deems just and proper.

Dated: October 9, 2025

Respectfully submitted,

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